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Received & Inspected

MAY - 1 2009

FCC Mail Room

7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com

VIA OVERNIGHT DELIVERY

April 30, 2009

Federal Communications Commission Office of the Commission Secretary 445 12th Street, S.W. Washington, D.C. 20554

Re: Section 63.71 Application of Stratos Offshore Services Company for Authority to

Discontinue Certain Services

John Staurulakis, Inc. (JSI) respectfully files the enclosed Application of Stratos Offshore Services Company ("Stratos") for Authority to Discontinue Certain Services. This filing is made in compliance with Section 63.71 of the Commission's rules (47 C.F.R. § 63.71).

Enclosed are the original and four (4) copies of this filing. An additional copy of this transmittal letter is included with this filing marked "File Stamp Copy" along with a self-addressed stamped envelope. Please provide the appropriate stamp on this letter denoting that this filing has been received by the FCC, and return this letter in the envelope provided to JSI. Please let me know if you have questions.

Sincerely,

Kenneth T. Cartmell

Senior Consultant - Regulatory Affairs

on behalf of

Michael Hall Director, Network Operations-North America Stratos Offshore Services Company

KTC/tms Enclosures

cc:

Michael Hall, Stratos Offshore Services Company

Echelon Building II, Suite 200 9430 Research Blvd. Austin, Texas 78759

Austin, 1 exas /8/59 phone: 512-338-0473, fax: 512-346-0822 Eagandale Corporate Center, Suite 310 1380 Corporate Center Curve Eagan, Minnesota 55121 phone: 651-452-2660, fax: 651-452-1909 6849 Peachtree Dunwoody Road Building B-3, Suite 200 Atlanta, Georgia 30328 phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane Bountiful, Utah 84010 phone: 801-294-4576.fax; 801-294-5124

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

MAY - 1 2009

FCC Mail Room

In the Matter of)	
)	
Section 63.71 Application of)	
Stratos Offshore Services Company)	Comp. Pol. File No.
For Authority to Discontinue)	-
Certain Services	j	

SECTION 63.71 APPLICATION

Pursuant to Sections 63.71 of the Commission's Rules¹ and Section 214(a) of the Communications Act of 1934, as amended,² Stratos Offshore Services Company ("Stratos" or the "Company") hereby files this application to discontinue the provision of local telephone service to a small number of business customers that the Company serves in the States of Louisiana and Texas ("Application").³ In support of this Application, Stratos submits the following:

I. Information Required by Section 63.71(a)(1) -(4)

A. Name and Address of Carrier

Stratos Offshore Services Company 1710W Willow Scott, LA 70583

For purposes of this Application, the Commission may contact: Kenneth Cartmell John Staurulakis, Inc. 7852 Walker Drive, Suite 200 Greenbelt, MD 20770

B. Date of Planned Service Discontinuance

See 47 C.F.R. § 63.71.

² See 47 U.S.C. § 214(a).

As required by Section 63.71(a) of the Commission's Rules, Stratos has notified and submitted a copy of this Application concurrent with this filing, to the Louisiana Public Service Commission and the Public Utility Commission of Texas.

Stratos plans to discontinue service to its customers in the States of Louisiana and Texas on or about July 1, 2009, or upon completion of obtaining all necessary federal and state regulatory approvals.

C. Points of Geographic Areas of Service Affected

Stratos currently serves a total of one hundred and sixty five (165) business customers in the affected States. Specifically, as of the date of this filing, Stratos serves zero (0) residential customers and one hundred and sixty three (163) business customers in Louisiana and zero (0) residential customers and two (2) business customers in Texas. Please reference Exhibit A which reflects the number of customers, states, counties, and cities affected by the discontinuance of stand-alone products as outlined in the company's tariff.

D. Brief Description of the Types of Services Affected

In the areas referenced above, Stratos proposes to discontinue providing standalone products offered in Stratos' tariff to certain business customers. Upon receipt of the proper authorizations, Stratos will only offer such services to business customers who also subscribe to the Stratos' bundled VSAT Services of Microwave Services. Stand-alone services will be discontinued to all other customers, with the exception of a few Municipal Government entities that have been indentified as "Qualifying Entities" as defined in the state tariff revisions that are being made in conjunction with this Section 63.71 Application Filing.

II. Description of the Dates and Methods of Notice to All Affected Customers

On April 22, 2009, Stratos sent written Notices to all affected customers in the States of Louisiana and Texas. A sample copy of the Notices sent to these customers is attached as Exhibit B.

III. Status of Carrier

Stratos is non-dominant with respect to the services that it proposes to discontinue in the States of Louisiana and Texas.

IV. Circumstances of Discontinuance

The Company's decision to discontinue stand-alone products offered in Stratos' tariff to certain business customers in Louisiana and Texas was a difficult decision. Primarily, Stratos has decided to concentrate its efforts on its core market. Additionally, this decision was based on the fact that Stratos only provides these services to a small number of customers in these States. Understandably, the costs of doing business associated with these stand-alone products in these locations outweighs any revenues collected or other benefits associated with providing stand-alone service to business customers in these States. In order to provision terrestrial services in Louisiana and Texas, Stratos does not own and operate all of the facilities used to provision such

services. Therefore, Stratos must rely on the underlying incumbent local exchange carrier's network to provision these services. Regulations affecting the price of the incumbent local exchange carrier's network facilities have increased Stratos' costs such that it is no longer profitable for Stratos to provision stand-alone terrestrial products to business customers.

V. Certification

On behalf of Stratos Offshore Services Company, I, the undersigned, Michael Hall, Director, Network Operations-North America, Stratos Offshore Services Company, hereby certify that the statements contained herein are true, complete and correct to the best of my knowledge and made in good faith.

VI. Conclusion

For the reasons stated herein, the Company respectfully requests grant of this Application.

Respectfully Submitted,

Michael Hall

Director, Network Operations-North America

Stratos Offshore Services Company

Stratos Offshore Services Company 1710 W. Willow Scott, LA 70583

April 22, 2009

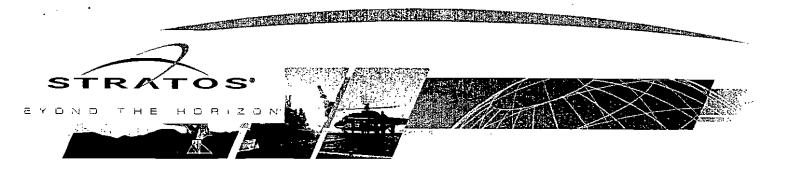


Exhibit A



Stratos Offshore Services Company

States/Counties/Cities affected by the Discontinuance of Certain Stand Alone Business Telecommunications Services

Exhibit A

LOUISIANA CUSTOMERS (163)		TEXAS CUSTOMERS (2)	
ACADIA	ORLEANS	HOUSTON	
Eunice	New Orleans	Houston	
Rayne			
•	PLAQUEMINES	IRVING	
Calcasieu	Belle Chasse	Plano	
Lake Charles			
	RAPIDES		
EAST BATON ROUGE	Alexandria		
Baton Rouge	Pineville		
East Feliciana	ST JOHN THE BAPTIST		
Clinton	Metairie		
EVANGELINE	ST LANDRY		
Ville Platte	Opelousas		
IBERIA	ST MARTIN		
Jeanerette	Arnaudville		
New Iberia			
	ST MARY		
JEFFERSON	Charenton		
Marrero	Morgan City		
LAFAYETTE	VERMILION		
Broussard	Abbeville		
Carencro			
Lafayette			
Scott			
Youngsville			
•			

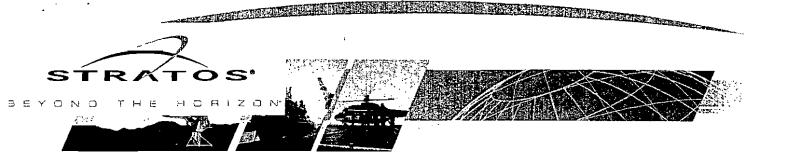
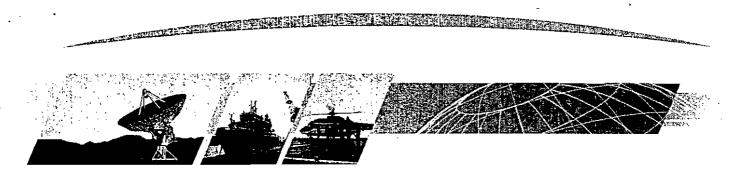


Exhibit B





April 22, 2009

Dear Customer,

This is to inform you that Stratos Offshore Services, Inc. ("Stratos") will no longer be providing communication products and or services to customers who do not also subscribe to Stratos' VSAT, Microwave Services and qualifying municipal government entities effective July 1, 2009 or upon approval of the appropriate regulatory agencies, whichever occurs later.

We will also be personally contacting you in the near future to discuss the specific services you are receiving from Stratos.

There are many quality and reputable alternatives in your market area for you to consider.

Our business decision is based on our desire to focus our resources in the markets described above where we can achieve the scale of operations necessary to profitably compete.

We are committed to providing reliable, uninterrupted service and thus have aligned with tw telcom to assist you in migrating your services. tw telcom offers a variety of products and services in your area. You will be able to retain your same phone number. We request that you research and make commitments to an alternative provider before June 1, 2009.

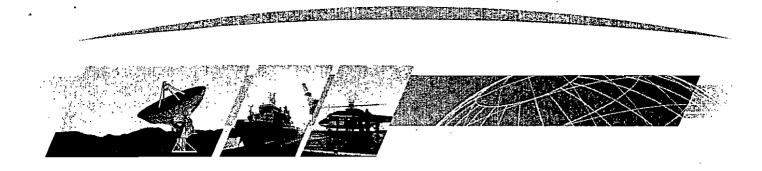
We are providing this notice well in advance of our target <u>final service transition date of July 1st</u> to allow you sufficient time to review pricing, products and services provided by tw telcom, or find another communications provider to serve your needs. Todd Clements, Account Executive, tw telcom will be assigned to handle Stratos customer migration. You may contact Todd at 337-781-9294.

If you decide not to select tw telcom as your provider, you must contact a local telephone service provider of choice and request that your service be switched to that provider. We encourage you to contact Todd or an alternate provider as soon as possible.

The Federal Communications Commission ("FCC") will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments within 15 days of receipt of this notification. Address them to the Federal Communications Commission, Washington DC 20554, and reference the application of Stratos Offshore Services, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

We regret any inconvenience we may have caused and we thank you for the opportunity to have served you. If you need assistance, please contact Stratos customer service at 1 800-563-2255.



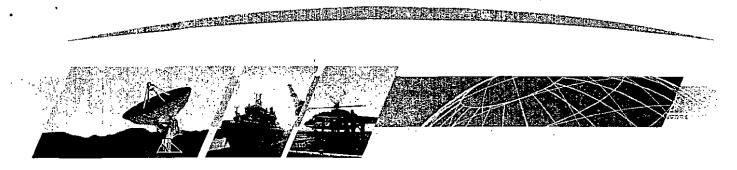


Additional Carriers in your area:

Louisiana

- Cox 1-225-615-1000 <u>www.cox.com</u>
- AT&T 1-888-757-6500 www.at&t.com

- Bell South 843-534-2778 www.bellsouth.com
- AT&T 972-316-2901 www.at&t.com
- Comcast 1-888-866-6838 <u>www.comcast.com</u>



April 22, 2009

Dear Customer,

This is to inform you that Stratos Offshore Services, Inc. ("Stratos") will no longer be providing communication products and or services to customers who do not also subscribe to Stratos' VSAT, Microwave Services and qualifying municipal government entities effective July 1, 2009 or upon approval of the appropriate regulatory agencies, whichever occurs later.

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You will be able to retain your same phone number. We request that you research and make commitments to an alternative provider before June 1, 2009. We are providing this notice well in advance of our target <u>final service</u> <u>transition date of July 1st</u> to allow you sufficient time to review pricing, products and services provided by other communications providers to serve your needs. We encourage you to contact a new provider as soon as possible.

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Additional Carriers in your area:

Louisiana

- Cox 1-225-615-1000 www.cox.com
- AT&T 1-888-757-6500 www.at&t.com

- Bell South 843-534-2778 www.bellsouth.com
- AT&T 972-316-2901 www.at&t.com
- Comcast 1-888-866-6838 www.comcast.com





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VIA OVERNIGHT DELIVERY

Received & Inspected

JUN 4 - 2009

FCC Mail Room

June 3, 2009

Ms. Kimberly Jackson Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re:

Section 63.71 Application of Stratos Offshore Services Company for Authority to

Discontinue Certain Services

Ms. Jackson:

John Staurulakis, Inc. (JSI) respectfully files the enclosed revised Customer Notice and a Certificate of Service associated with the Application of Stratos Offshore Services Company ("Stratos") for Authority to Discontinue Certain Services, filed with the FCC on May 1, 2009. This filing is made in compliance with Section 63.71 of the Commission's rules (47 C.F.R. § 63.71), and in response to a request for additional information made by Mr. Rodney McDonald. Mr. McDonald asked that I forward a copy of this filing to you as well, which was filed with the FCC on June 4, 2009. Please let me know if you have questions, or if you require additional information. Thank you!!

Sincerely,

Kenneth T. Cartmell

Senior Consultant – Regulatory Affairs

KTC/tms Enclosures

cc: Rodney McDonald, Federal Communications Commission



7852 Walker Drive, Suite 200 Greenbelt, Maryland 20770 phone: 301-459-7590, fax: 301-577-5575 internet: www.jsitel.com, e-mail: jsi@jsitel.com Received & Inspected
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VIA OVERNIGHT DELIVERY

June 3, 2009

Federal Communications Commission Office of the Commission Secretary 445 12th Street, S.W. Washington, D.C. 20554

Re: Section 63.71 Application of Stratos Offshore Services Company for Authority to

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Enclosed are the original and four (4) copies of this filing. An additional copy of this transmittal letter is included with this filing marked "File Stamp Copy" along with a self-addressed stamped envelope. Please provide the appropriate stamp on this letter denoting that this filing has been received by the FCC, and return this letter in the envelope provided to JSI. Please let me know if you have questions.

Singerely,

Kenneth T. Cartmell

Senior Consultant - Regulatory Affairs

on behalf of

Michael Hall Director, Network Operations-North America Stratos Offshore Services Company

KTC/tms Enclosures

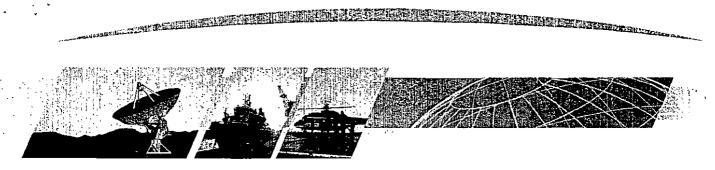
cc: Michael Hall, Stratos Offshore Services Company

Rodney McDonald, Federal Communications Commission

Echelon Building II, Suite 200 9430 Research Blvd. Austin, Texas 78759

Austin, Texas 78759 phone: 512-338-0473, fax: 512-346-0822 Eagandale Corporate Center, Suite 310 1380 Corporate Center Curve Eagan, Minnesota 55121 phone; 651-452-2660, fax: 651-452-1909 6849 Peachtree Dunwoody Road Building B-3, Suite 200 Atlanta, Georgia 30328 phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane Bountiful, Utah 84010 phone: 801-294-4576,fax: 801-294-5124



June 3, 2009

Dear Stratos Telecom Customer,

This is to inform you that Stratos Offshore Services, Inc. ("Stratos") will no longer be providing communication products and or services to customers who do not also subscribe to Stratos' VSAT, Microwave Services and qualifying municipal government entities effective July 1, 2009 or upon approval of the appropriate regulatory agencies, whichever occurs later. This Notice is being reissued to clarify the Federal Communications Commission's ("FCC") Comment Period noted below.

We will also be personally contacting you in the near future to discuss the specific services you are receiving from Stratos.

There are many quality and reputable alternatives in your market area for you to consider.

Our business decision is based on our desire to focus our resources in the markets described above where we can achieve the scale of operations necessary to profitably compete.

You will be able to retain your same phone number. We request that you research and make commitments to an alternative provider before June 1, 2009. We are providing this notice well in advance of our target <u>final service</u> <u>transition date of July 1st</u> to allow you sufficient time to review pricing, products and services provided by other communications providers to serve your needs. We encourage you to contact a new provider as soon as possible.

The Federal Communications Commission will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than **15 days after the FCC issues the Public Notice of the proposed discontinuance**. Address them to the Federal Communications Commission, Washington DC 20554, and reference the application of Stratos Offshore Services, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

We regret any inconvenience we may have caused and we thank you for the opportunity to have served you. If you need assistance, please contact Stratos customer service at 1 800-563-2255.

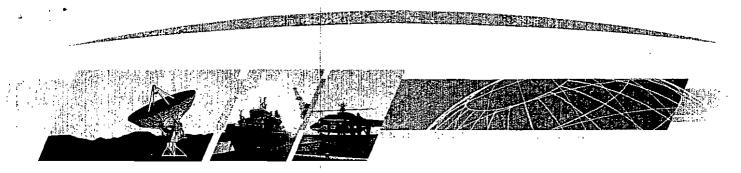
Additional Carriers in your area:

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- AT&T 972-316-2901 www.at&t.com
- Comcast 1-888-866-6838 <u>www.comcast.com</u>





June 3, 2009

Dear Stratos Telecom Customer.

This is to inform you that Stratos Offshore Services, Inc. ("Stratos") will no longer be providing communication products and or services to customers who do not also subscribe to Stratos' VSAT, Microwave Services and qualifying municipal government entities effective July 1, 2009 or upon approval of the appropriate regulatory agencies, whichever occurs later. This Notice is being reissued to clarify the Federal Communications Commission's ("FCC") Comment Period noted below.

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- AT&T 972-316-2901 www.at&t.com
- Comcast 1-888-866-6838 <u>www.comcast.com</u>



CERTIFICATE OF SERVICE

I hereby certify that the aforementioned Section 63.71 Application of Stratos Offshore Services Company for Authority to Discontinue Certain Services, filed with the Federal Communications Commission on May 1, 2009, and the revised Customer Notice that accompanies this filing, was served this 3rd day of June, 2009, by mailing true and correct copies thereof, postage prepaid, to the following persons:

Secretary of Defense Attn: Special Assistant for Telecommunications 1000 Defense Pentagon Washington, D.C. 20301-1000

The Honorable Governor of Louisiana Bobby Jindal Office of the Governor & Lt. Governor State Capitol P.O. Box 94004 Baton Rouge, Louisiana 70804-9004

The Honorable Governor of Texas Rick Perry Office of the Governor & Lt. Governor State Capitol P.O. Box 12428 Austin, Texas 78711-2428

Louisiana Public Service Commission Secretary, Lawrence C. St. Blanc 602 North Fifth Street P.O. Box 91154 Baton Rouge, Louisiana 70821-9154

Texas Public Utility Commission of Texas Filing Clerk, James Galloway 1701 N. Congress Avenue Austin, Texas 78711

Kenneth T. Cartmell